

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

THE STATE OF TEXAS, et al., §
§
Plaintiffs, §
v. § Civil Action No. 4:20-cv-00957-SDJ
§
GOOGLE LLC, §
§
Defendant. §

**JOINT MOTION FOR AN ORDER
FOR REPRODUCTION OF DISCOVERY**

Defendant Google LLC (“Google”) and Plaintiffs jointly move the Court to enter the parties’ Stipulation and Proposed Order for Reproduction of Discovery (“Proposed Order”), attached as Exhibit A.

Following remand of this case from *In re Google Digital Advertising Antitrust Litig.*, No. 1:21-md-03010 (S.D.N.Y.) (“MDL”), and in the absence of an operative coordination order, the parties are currently unable to use in this case the relevant discovery materials produced by third parties in *United States v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.) (“EDVA Action”) during the coordinated discovery period between the EDVA Action and the MDL. The Proposed Order is to enable the parties to use those relevant discovery materials in this case in a manner that is consistent with the governing Modified Protective Order in the EDVA Action (entered as docket entry 203 in the EDVA Action). If entered, Google will promptly serve the Order on third parties in the EDVA Action to afford them an opportunity to seek a protective order from this Court.

Therefore, the parties respectfully request that this Court enter the Proposed Order.

Dated: April 23, 2024

/s/ W. Mark Lanier

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on April 23, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ R. Paul Yetter
R. Paul Yetter

CERTIFICATE OF CONFERENCE

I certify that the meet and confer requirements in Local Rule CV-7(h) have been met. This motion is consented to and not opposed by any party.

/s/ R. Paul Yetter
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